

EXHIBIT 1

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

FTX TRADING LTD., *et al.*¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Re: Docket No. ____

**ORDER GRANTING MOTION OF THE JOINT PROVISIONAL LIQUIDATORS FOR
A DETERMINATION THAT THE U.S. DEBTORS' AUTOMATIC STAY DOES NOT
APPLY TO, OR IN THE ALTERNATIVE FOR RELIEF FROM STAY FOR FILING OF
THE APPLICATION IN THE SUPREME COURT OF THE COMMONWEALTH OF
THE BAHAMAS SEEKING RESOLUTION OF NON-U.S. LAW AND OTHER ISSUES**

Upon the consideration of the motion (the “**Motion**”)² of Brian C. Simms KC, Kevin G Cambridge, and Peter Greaves (“**JPLs**”), in their capacity as the duly appointed joint provisional liquidators of FTX Digital Markets Ltd. (“**FTX Digital**”) and foreign representatives of the Provisional Liquidation of FTX Digital, seeking (i) a determination that the automatic stay does not apply to the proposed filing of the directions application (the “**Application**”) to be issued in the Supreme Court of The Bahamas (the “**Bahamas Court**”) or in the alternative, (ii) granting relief from the automatic stay pursuant to Section 362(d)(1) of the Bankruptcy Code in order to allow the JPLs to file the Application in the Bahamas Court; and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order of

¹ The last four digits of FTX Trading Ltd.’s tax identification number are 3288. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the debtors (the “**U.S. Debtors**”) and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the U.S. Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² Capitalized terms used but not defined herein are to be given the meanings ascribed to them in the Motion.

Reference from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other notice needs be provided; and the Court having reviewed the Motion, the Greaves Declaration, and the MacMillan-Hughes Declaration; and the Court having determined that the legal and factual bases set forth in the Motion, the Greaves Declaration, and the MacMillan-Hughes Declaration, and on the record made at the hearing (if any) to consider the Motion, establish just cause for the relief granted herein; and upon all of the proceedings had before the Court and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED ADJUDGED, AND DECREED THAT:

1. The Motion is GRANTED as set forth herein.
2. To the extent applicable, the automatic stay imposed in Chapter 11 Cases by section 362(a) of the Bankruptcy Code is hereby modified to allow the JPLs to seek the relief requested in the Motion.
3. Any relief from the automatic stay shall be effective immediately upon entry of this Order and the 14-day stay provided in Bankruptcy Rule 4001(a)(3) shall not apply.
4. This Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.